| 1 2 3 4 5 6 | DANIEL G. BOGDEN United States Attorney DREW SMITH Assistant United States Attorney 333 Las Vegas Boulevard South, Suite 5000 Las Vegas, Nevada 89101 Telephone: (702) 388-6336 Facsimile: (702) 388-5087 E-mail: Drew.Smith@usdoj.gov | DISTRICT COURT |
|----------------------------|--|-----------------------------|
| 7 | DISTRICT OF NEVADA | |
| 8 | UNITED STATES OF AMERICA, |) |
| 9 | Plaintiff, |) } |
| 10 | v. | 2:10-CV-0561-JCM (PAL) |
| 11 | \$3,306.77 IN UNITED STATES CURRENCY, |) |
| 12 | Defendant. |)) |
| 13 | UNITED STATES OF AMERICA, |) |
| 14 | Plaintiff, |) |
| 15 | V. |) 2:10-CV-0562-JCM (PAL) |
| 16 | \$613.23 IN UNITED STATES CURRENCY, |)) |
| 17 | Defendant. UNITED STATES OF AMERICA, |)) |
| 18 | Plaintiff, |)) |
| 19 | v. |) 2:10-CV-0563-JCM (PAL) |
| 20 | \$6,516.34 IN UNITED STATES CURRENCY, |)) |
| 21 | Defendant. |)) |
| 22 | UNITED STATES OF AMERICA, |)) |
| 23 | Plaintiff, |)) |
| 24 | V. | 2:10-CV-0564-JCM (PAL) |
| 25 | \$13,064.93 IN UNITED STATES CURRENCY, |)) |
| 26 | Defendant. | |

THE UNITED STATES OF AMERICA'S UNOPPOSED MOTION TO STAY THE CIVIL ACTIONS

The United States of America, by and through Daniel G. Bogden, United States Attorney, and Drew Smith, Assistant United States Attorney, hereby moves this Court to stay the above-captioned civil forfeiture actions pursuant to 18 U.S.C. § 981(g)(1) and (g)(2) until the completion of the related criminal case, United States v. Sharon Chow, 2:10-CR-0158-JCM (PAL).

The United States, Sharon Chow, and her counsel, Christopher R. Oram, agree that civil discovery in this matter would adversely affect the United States, Sharon Chow, and her counsel, Christopher R. Oram, in conducting the related criminal case.

On June 24, 2010, Christopher R. Oram, counsel for Sharon Chow, did not oppose, and agreed to, this Unopposed Motion.

This Unopposed Motion is not submitted solely for the purpose of delay or for any other improper purpose.

Respectfully submitted this 24th day of June, 2010.

DANIEL G. BOGDEN United States Attorney

/s/ Drew Smith DREW SMITH Assistant United States Attorney

IT IS SO ORDERED:

July 1, 2010

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PROOF OF SERVICE I, Jacqueline L. Peltier, certify that the following individual was served with a copy of the United States of America's Unopposed Motion to Stay the Civil Actions on June 24, 2010, by the below identified method of service: E-mail/ECF Christopher R. Oram 520 South Fourth Street, Second Floor Las Vegas, NV 89101 crorambusiness@aol.com Counsel for Sharon Chow /s/ Jacqueline L. Peltier JACQUELINE L. PELTIER Paralegal Specialist